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**COMMUNITY RELATIONS PLAN
FOR
AMERICAN CHEMICAL SERVICE SITE
GRIFFITH, INDIANA
MARCH 1986**

**Prepared For
U.S. Environmental Protection Agency
Office of Public Affairs
Region V
230 South Dearborn Street
Chicago, Illinois 60604**

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COMMUNITY RELATIONS PLAN
FOR
AMERICAN CHEMICAL SERVICE SITE
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Document No.: 160-CR2-OP-CGRR-1
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CDM

environmental engineers, scientists,
planners, & management consultants

CAMP DRESSER & McKEE INC.

11 East Adams Street, Suite 1100
Chicago, Illinois 60603
312 786-1313

March 27, 1986

Mr. Gregory A. Vanderlaan
Regional Project Officer
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

Mr. Arthur Gasior
Regional Superfund Community Relations
Coordinator
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

Subject: Final Community Relations Plan for
American Chemical Service Site

Work Assignment No.: 61-5LJ7.1

EPA Contract No.: 68-01-6939

Document No.: 160-CR2-OP-CGRR-1

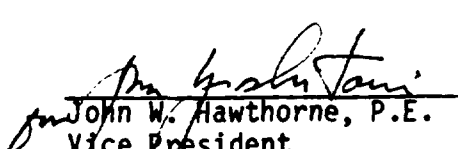
Dear Mr. Vanderlaan and Mr. Gasior:

Camp Dresser & McKee Inc. is pleased to submit this final community relations plan for the American Chemical Service site.

If you have any questions or comments, please contact me.

Very truly yours,

CAMP DRESSER & McKEE INC.


John W. Hawthorne, P.E.
Vice President
Region V Manager

JWH:mam

PERFORMANCE OF REMEDIAL RESPONSE
ACTIVITIES AT UNCONTROLLED HAZARDOUS
WASTE SITES (REM II)

U.S. EPA CONTRACT NO. 68-01-6939

COMMUNITY RELATIONS PLAN
FOR
AMERICAN CHEMICAL SERVICE SITE
GRIFFITH, INDIANA

REM II DOCUMENT NO.: 160-CR2-OP-CGRR-1

Prepared by: Jacqueline Dingfelder Date: 3/26/86
Jacqueline Dingfelder
REM II Community Relations
Specialist

Approved by: Carol L. Anderson Date: 3/17/86
Marion Cox
REM II NPMO Community Relations
Coordinator

Approved by: James M. Burton Date: 3/24/86
James Burton
REM II Site Manager

Approved by: John W. Hawthorne Date: 3/26/86
John W. Hawthorne, P.E.
REM II Region V Manager

**COMMUNITY RELATIONS PLAN
AMERICAN CHEMICAL SERVICE SITE
GRIFFITH, LAKE COUNTY, INDIANA**

This community relations plan identifies issues of community concern regarding the American Chemical Service site, located in Griffith, Lake County, Indiana and describes the community relations program to be implemented during the remedial investigation and feasibility study (RI/FS) to meet those concerns. The United States Environmental Protection Agency (U.S. EPA) Region V office will supervise the technical and community relations activities at the site. The schedule for the technical activities at the site will soon be determined.

This community relations plan is divided into the following sections:

- A. Site Description;
- B. Community Background;
- C. Highlights of the Community Relations Program;
- D. Community Relations Activities and Timing; and
- E. Schedule and Staffing Plan.

A contact list of key officials, media representatives, interest groups, and local citizens is included as Appendix A. Appendix B lists suggested locations for an information repository and public meetings. The community relations plan is based on interviews conducted in November 1985 with Griffith officials and residents.

A. Site Description

The American Chemical Service site is located in southeast Griffith, within Lake County, Indiana. (See Exhibit 1 for a site location map.) The Superfund site includes the following components:

- American Chemical Service, Inc., a currently operating solvent reclamation and chemical manufacturing facility;
- Kapica Drum, Inc., a former drum reconditioning facility; and
- Griffith Landfill, a sanitary landfill, currently owned and operated by the Town of Griffith.

Located in the immediate vicinity of the site are a few residences, railroad tracks, drainage ditches and marshlands. The nearest homes are located approximately one-half mile from the site, except for a few scattered residences across the street from the Griffith Landfill. (See Exhibit 2 for a site map.)

The American Chemical Service site has a long and complicated history. American Chemical Service, Inc. began operating in 1955, solely as a solvent recovery firm. Later the company also began a limited chemical manufacturing operation. From 1955 to 1972, American Chemical Service, Inc. disposed a variety of wastes produced during chemical manufacturing and solvent recovery in an open landfill, known as the containment area, on their property.

From 1968 to 1970, American Chemical Service also operated an on-site incinerator and disposed the incineration ash in the containment area. In addition to incineration waste, an estimated 20,000 to 30,000 drums and general refuse were deposited in those containment areas. Drums were

**American Chemical Service Site
Lake County, Indiana**

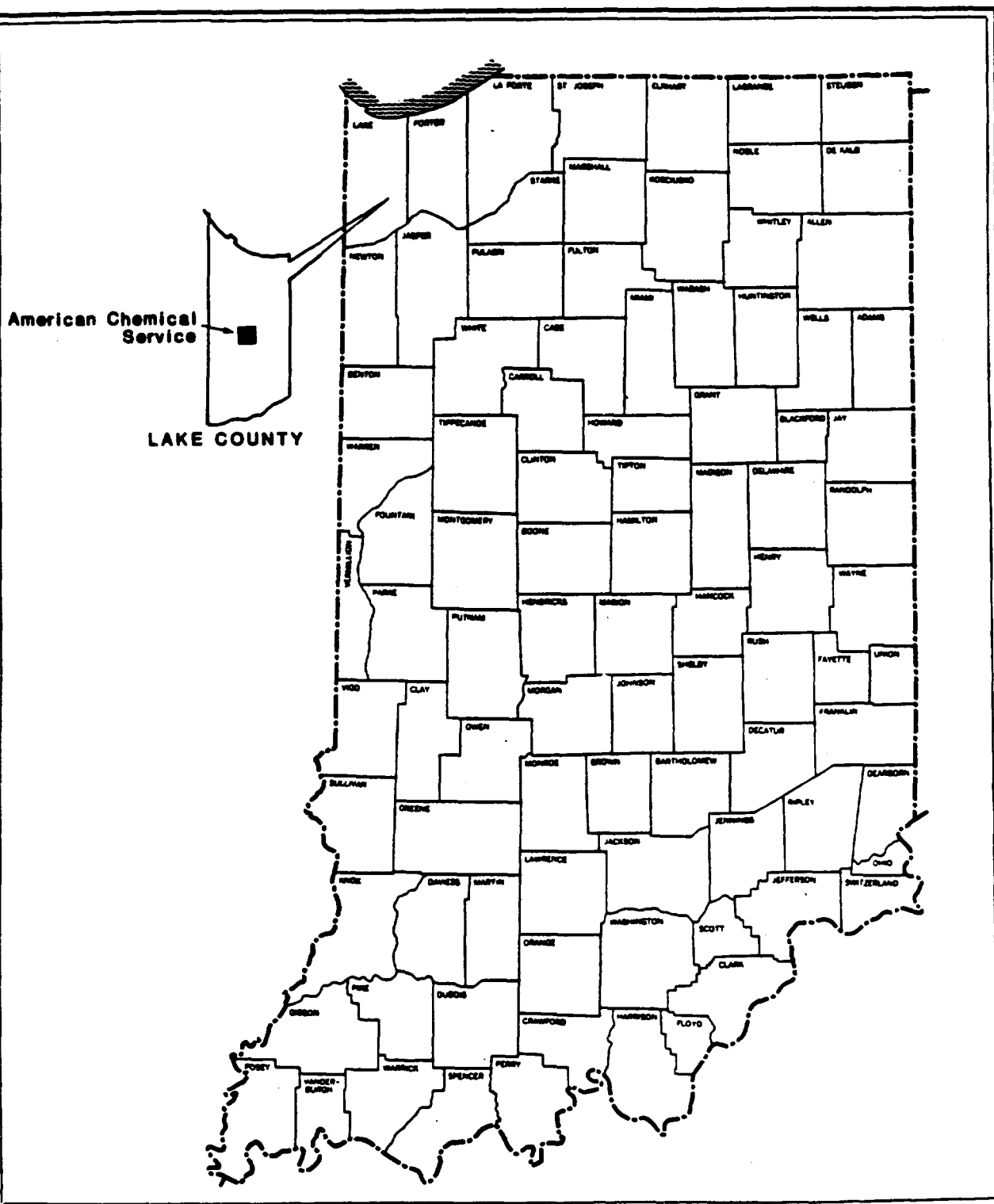
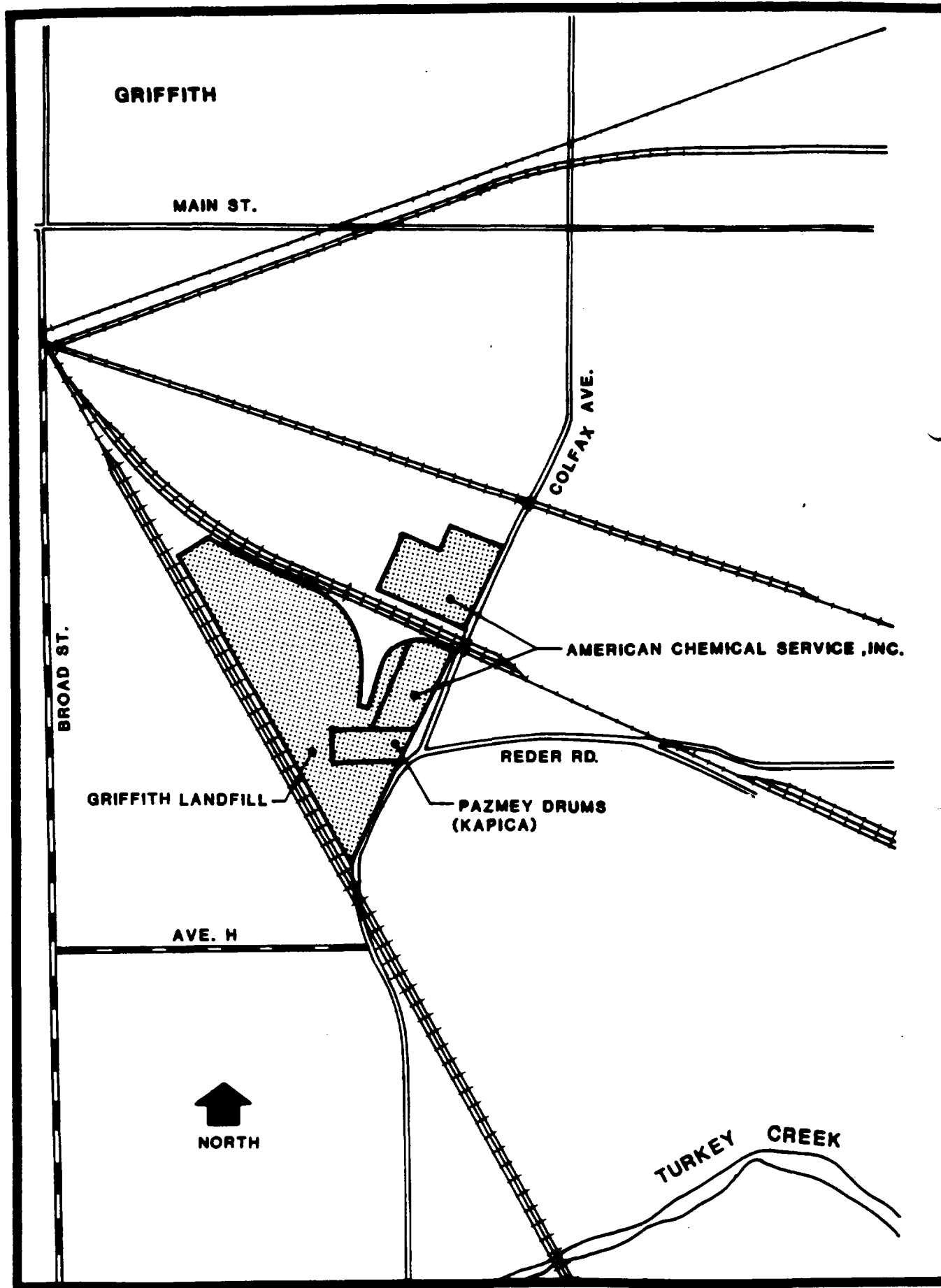


EXHIBIT 2 : **AMERICAN CHEMICAL SERVICE SITE MAP**
GRIFFITH, INDIANA



reported to be partially filled with unreclaimed waste. Also, a tank truck partially filled with sludge material was buried in that same area. American Chemical Service discontinued use of the containment area and placed a cover consisting of a two to three foot layer of soil on the landfill. In 1972, the Indiana State Board of Health (ISBH) responded to complaints from several residents of Griffith that the company was discharging chemicals into the sanitary sewer and improperly disposing chemicals on the site. During the State's inspections of the site, ISBH noted the following problems: improper waste handling, improper spill prevention and poor site maintenance. In 1974 and 1975, the State also responded to reports that American Chemical Service was discharging chemicals into the sanitary sewer and allegedly dumping chemicals on site.

In 1980, the State requested that U.S. EPA conduct site investigations to provide information for the Hazard Ranking System (HRS) under CERCLA. Sampling results from this inspection revealed that a number of priority pollutants were found on site. Later that year, U.S. EPA conducted another inspection at the American Chemical Service site for compliance with the Resource Conservation and Recovery Act (RCRA). U.S. EPA noted a number of violations including: lack of controlled site entry; lack of a site evacuation plan; incomplete operating records; and insufficient waste analysis records. A compliance order was subsequently issued by the U.S. EPA and in 1981, American Chemical Service, Inc. entered into a consent agreement with the Federal government to remedy the noted violations under RCRA. In 1982, U.S. EPA's Field Investigation Team conducted another site investigation for the HRS and in 1983, the site was placed on the National Priorities List (NPL).

A facility owned by the Pazmey Corporation (formerly Kapica Drum, Inc.) and the Griffith Landfill have also been included as part of the American Chemical Service site. In 1951, Kapica Drum, Inc. began operating a drum reconditioning facility adjacent to the American Chemical Service facility.

In 1983, the State received complaints from the nearby residents regarding runoff into the soil adjacent to the facility of rinse waters generated during drum cleaning. The State investigated the facility and found Pazmey Corporation in violation of State environmental laws.

The Griffith Landfill, which began operating in the 1950s, is owned and operated as a sanitary landfill by the Town of Griffith. It has been included as part of the site because U.S. EPA suspects that wastes from American Chemical Service, Inc., and Kapica Drum, Inc., were disposed in the landfill prior to the implementation of RCRA.

U.S. EPA is currently investigating the existence of potentially responsible parties (PRPs) and developing a final work plan for the RI/FS at the site. Meetings with the PRP's will be held to negotiate an agreement for conducting the RI/FS. If U.S. EPA and the PRP's fail to sign an agreement, RI/FS activities at the site will be funded by Superfund.

B. Community Background

1. Community Profile

Griffith is located in the highly industrialized portion of Northern Indiana known as the Calumet Region. Many of Griffith's 17,000 residents commute to other cities within the Calumet region or to Chicago to work. There is a small amount of industry within the town itself. Griffith is governed by a board of trustees consisting of five members, one of whom serves as the town board president.

The citizens most directly affected by the American Chemical Service site reside in southern Griffith or in the unincorporated community southeast of Griffith. All of the residents in the unincorporated area and a few residents in Southern Griffith rely on private wells for their water

supply. Southern Griffith residents often feel that their area is treated as a separate town. They have been dissatisfied with the town's provision of certain services, such as road paving and sidewalk installation, to their area. These residents have also complained that the town and county have not been responsive to their complaints about the disposal practices of American Chemical Service and Pazmey Corporation.

Local chapters of the Audubon Society and the Izaak Walton League in the Griffith area are particularly active in environmental issues. Both of these groups are involved with general hazardous waste issues in the county and have expressed particular interest in the environmental and health effects of hazardous waste at the American Chemical Service site.

2. History of Community Involvement

Community concern regarding the American Chemical Service site has fluctuated. During the operation of the landfill in the 1960s and early 1970s, the Griffith town board and county health department received complaints from residents living near the site regarding odors and decaying vegetation around the landfill. The State also received complaints from citizens and Griffith local officials regarding improper on-site disposal practices and chemical discharges into the Griffith sanitary sewer system. After the State investigated the site, American Chemical Service placed a soil cover on the open landfill and discontinued their open dumping policy. Overall citizen interest in the site temporarily subsided after this action.

In 1981, the Hammond Times and the Gary Post Tribune printed articles describing the results of the U.S EPA RCRA inspections and announcing the consent agreement. Subsequently, citizen interest increased and has remained high. A few members of the Southern Griffith community have been particularly active with the site and have adopted the role of spokespersons for this community.

In 1984, active members of the Southern Griffith community urged the town trustees to organize a forum for discussing the hazards of the American Chemical Service site. Two meetings were held, at which the residents expressed their specific concerns regarding the site. Citizens also exhibited their frustration with the slowness of the cleanup process. They urged the town trustees to exert pressure on U.S. EPA to expedite the RI/FS. In response to the citizen's request for action, the town board, in January 1985, established a Toxic Action Task Force appointed by the Griffith town board president and consisting of two town trustees and two citizens from Southern Griffith. By this time, the site had been on the NPL for sixteen months. Actions taken by the task force have included contacting Region V U.S. EPA and other Federal and State representatives, and lobbying their congressional representatives in Washington. Members of the task force are split on the issue of town involvement in the cleanup process. The town trustees strongly support the U.S. EPA and would like to remain supportive without interfering with the RI/FS activities. The citizens representing Southern Griffith would like to be guaranteed opportunities for adequate participation in the RI/FS process. They are particularly interested in establishing a schedule for RI/FS activities at the site to ensure that the cleanup is performed in a timely manner.

3. Current Community Concerns

Present citizen concern regarding the American Chemical Service site focuses on the following issues:

- (a) Initiation of the RI/FS. Members of the Griffith community are frustrated with the delay in the RI/FS process. Citizens complained that little or no action has been taken toward cleaning up the site. They are anxious for U.S. EPA to determine the nature and extent of contamination at the American Chemical Service site and the effects of contamination on the surrounding community.

(b) Health Effects. A major concern among residents living near the site is health effects from ground-water contamination and from exposure to contaminants in the air and soil. Those residents who rely on private wells for their drinking water are particularly concerned that no extensive testing for contaminants has been done. They have requested that U.S. EPA establish a ground-water monitoring program as part of the RI/FS activities for the site and keep them informed of the sampling results on a regular basis.

(c) Migration of Contamination Off Site. Many citizens and members of the Audubon Society and Izaak Walton League are concerned about on-site contamination spreading to off-site areas. In particular, their concerns focused on the effects of contamination on the surrounding vegetation, wildlife, and surface water. Runoff from the landfill enters ditches around the site, which drain into the Little Calumet River which eventually flows into Lake Michigan.

(d) Availability of Information. Several residents expressed frustration over the fact that they have received little information regarding the current status of the RI/FS project. Community members feel that they are unable to obtain information regarding enforcement actions and a schedule for the proposed RI/FS. These citizens have requested that U.S. EPA provide updates on the enforcement actions to the community as often as possible.

C. Highlights of the Community Relations Program

The current level of community awareness regarding the American Chemical Service site is high, especially among the members of the Southern Griffith community. Specific highlights of the community relations program are presented below.

1. Educate area residents and local officials about the procedures, policies, and requirements of the Superfund program.

Efforts to provide information about the Superfund program to Griffith residents and officials will assist citizens in understanding the proposed RI/FS activities for the site. In particular, because this is an enforcement-lead site, information regarding the enforcement process and responsible party liability under Superfund should be clearly explained to the community. Information on Superfund may be disseminated through workshops or fact sheets explaining the requirements and procedures of the program.

2. Establish an information repository to ensure that accurate and timely information on the site is available for public review.

An information repository should be located at the Griffith Town Hall. The work plan, final community relations plan, fact sheets, technical summaries, draft RI and FS reports, responsiveness summary and any other site-related materials should be placed in the repository as this information becomes available.

3. Identify a central contact at U.S. EPA to provide quick and reliable responses to any questions concerning the site raised by area residents, local officials, organizations or local news media.

The central U.S. EPA contact should also be responsible for filing all site-related information at the information repository to be established at the Griffith Town Hall. This person should also keep State officials informed of on-site plan developments and findings prior to public release.

4. Inform State officials, Griffith town trustees and Lake County health officers of all on-site plans, developments and findings prior to public release of this information.

Notification of the appropriate community officials before the site activities begin will ensure that local officials remain well informed about site developments and able to provide knowledgeable responses to citizens' questions.

5. Hold a public meeting after the work plan is approved and prior to initiation of the RI/FS.

Griffith residents are anxious for cleanup activities at the site to begin. A public meeting early in the remedial process will allow U.S. EPA to explain the proposed RI/FS schedule for the site. Because Griffith residents have expressed interest in the negotiation process, discussion of the negotiated settlement (if one is reached) should be one agenda item of this meeting. A question-and-answer period following the formal presentation can provide residents an opportunity to voice their concerns. The meeting should be coordinated with members of the Griffith town board. Suggested public meeting locations are listed in Appendix B.

6. Provide opportunities for public participation in the decision-making process concerning the remedial action alternatives.

After the draft FS report is completed, a three-week public comment period must be held. A public meeting would be appropriate at the beginning of the comment period to explain the findings, the recommended alternatives, and the process U.S. EPA will use to choose among the alternatives. This information should be presented in an easily understandable manner using non-technical language. A few weeks prior to the meeting, U.S. EPA should announce in the Hammond Times and the Gary Post Tribune the date and place of the public meeting, the dates for the public

comment period, and the procedures for commenting on the feasibility study. This information should also be distributed to local officials, community leaders, and interested organizations.

7. Hold informal meetings with members of the Southern Griffith community and other interested organizations.

Southern Griffith residents have been the most vocal in communicating their concerns to town, county, and State officials. The town trustees have organized forums to address specifically the concerns of this community. U.S. EPA participation in forum meetings would provide a convenient opportunity to discuss the status of site activities and to answer citizens' questions regarding the site. Because the residents living near the site are most concerned with the threat of ground-water contamination, U.S. EPA should be prepared to address this issue thoroughly. If private wells are to be sampled as part of the RI, then these residents will have to be informed of the sampling schedule, purpose of the sampling program, and the results of the tests as they become available. This may be done on an individual basis or in an informal discussion group, depending on the number of private wells being sampled. The forums should be coordinated with the town trustees and Southern Griffith community representatives.

D. Community Relations Activities and Timing

Specific community relations activities that are recommended for the American Chemical Service site are listed below as they correspond to technical milestones. A schedule is also provided at the end of this section.

Technical Milestones

1. Prior to initiation of the remedial investigation

Community Relations Activities

- o Establish information repository.
- o Designate information contact at U.S. EPA.
- o Hold public meeting to explain the negotiated settlement (if one is reached), present the final work plan and proposed RI/FS schedule, and answer citizen questions.
- o Place information on Superfund procedures in information repository.

2. During the remedial investigation

- o Maintain telephone contact with State and local officials.
- o Prepare news releases and fact sheets, as needed, informing State and local officials prior to any release of information.
- o Hold informal meetings with the Southern Griffith community residents on an as-needed basis to respond directly to citizen inquiries about site developments.

3. Upon completion of the remedial investigation
 - o Schedule meetings with State and local officials to discuss RI findings and FS methodology.
 - o Hold public meetings to describe the RI findings.
 - o Prepare a fact sheet summarizing results of the RI.
 - o Conduct informal sessions with citizens and/or key community leaders to invite citizen participation during consideration of remedial alternatives.
 - o Prepare news releases.
4. During the feasibility study
 - o Maintain telephone contact with State and local officials.
 - o Prepare news releases, as needed, informing State and local officials prior to any news release.
5. Upon completion of the draft feasibility study report
 - o Schedule meetings with State and local officials to discuss U.S. EPA's preferred remedial alternative.
 - o Prepare a fact sheet explaining remedial alternatives considered during the FS.
 - o Publicize in the local media the three-week public comment period on the draft feasibility study report.

- o Hold a public meeting during the public comment period to solicit citizen comment on the remedial alternatives considered.
- 6. Upon completion of the Record of Decision
 - o Prepare responsiveness summary.
 - o Maintain telephone contact with State and local officials.
 - o Prepare news releases announcing final selection of remedial alternatives.
 - o Initiate revisions of community relations plan.
- 7. Prior to initiation of remedial design and remedial action
 - o Schedule meetings with State and local officials to discuss U.S. EPA remedial action plans.
 - o Prepare news releases and hold a press briefing to inform the public about U.S. EPA's remedial action plans.
 - o Conduct informal sessions with citizens of Southern Griffith and/or key community leaders on selected remedial alternatives.

E. SCHEDULE AND STAFFING PLAN

Community relations activities at the American Chemical Service site will be coordinated by Rodney Gaither, the U.S. EPA Remedial Site Project Officer and Arthur Gasior, the U.S. EPA Region V Superfund Community Relations Coordinator. Community relations contractor assistance will be provided as requested.

Community Relations Technique	Finalization of the Work Plan	During Remedial Investigation	Completion of the Remedial Investigation	During the Feasibility Study (FS)	Completion of the Draft FS Report	Completion of the Final FS Report	Initiation of Remedial Action
1) Information Repository	X-----			update as needed -----			
2) Central Information Contact	X						
3) Meeting with Local Officials	X-----		X -----	hold as needed -----	X-----		X
4) Fact Sheets/Technical Summaries	X		X		X		X
5) News Releases	X -----	provide as needed -----	X -----		X	X	
6) Three-Week Public Comment Period					X -----	X	
7) Public Meeting	X		X		X		
8) Informal Information Session		X -----		hold as needed -----		X	
9) Responsiveness Summary						X	
10) Community Relations Plan Revision						X	

This schedule is subject to change based on changes in the technical schedule for the American Chemical Service site.

APPENDIX A

LIST OF CONTACTS AND INTERESTED PARTIES

(Asterisk indicates person contacted during the development of the community relations plan.)

A. Federal Elected Officials

Senator Richard Lugar
Washington, DC Office (202) 224-4814
189 Dirksen Senate Office Building
Washington, DC 20510

District Office (219) 937-5380
5530 Sohl Avenue
Hammond, IN 46320

Senator Daniel Quayle
Washington, DC Office (202) 224-5623
286 Russell Office Building
Washington, DC 20510

District Office (219) 937-5380
5530 Sohl Avenue
Hammond, IN 46320
Contact: Tim Sanders

Representative Peter Visclosky
Washington, DC Office (202) 225-2461
1632 Longworth Office Building
Washington, DC 20515

District Office (219) 884-1177
215 West 35th Street
Gary, IN 41403

B. State Elected Officials

Governor Robert Orr (317) 232-4567
206 State House
Indianapolis, IN 46204

Senator John Bushemi (219) 980-1100
5847 Broadway
Merrillville, IN 46410

Senator Ralph J. Potesta (291) 931-4399
7332 Jackson Avenue
Hammond, IN 46324

Representative Jesse Villalpondo
7317 McCook Avenue
Hammond, IN 46323

(291) 923-4087

Representative Paul J. Hric
7039 North Cot Avenue
Hammond, IN 46324

(219) 844-6737

C. Local Elected Officials

Griffith Board of Trustees
* Eugene Rowe (President)
* Marthann Hanrath
* Patricia G. Schaad
Carl J. Konopasek
Stanley E. Dobosz

(219) 924-7500

Griffith Town Hall
111 North Broad Street
Griffith, IN 46319

Lake County Commissioners
* Noah A. Spann, Jr.
Steven Corey
Ernest Niemeyer

(219) 738-2020

Lake County Government Building
2293 North Main Street
Crown Point, IN 46307

D. U.S. EPA Region V Officials

U.S. EPA, Region V
230 South Dearborn Street
Chicago, IL 60604

* Rodney Gaither
Remedial Project Manager

(312) 886-4745

* Arthur Gasior
Superfund Community Relations
Coordinator

(312) 886-6128

E. State Agencies and Officials

Indiana State Board of Health
Division of Land Pollution Control
1330 W. Michigan Street
Indianapolis, IN 46206

* Catherine Lynch
Community Relations Coordinator

(317) 243-5057

Remedial Response Branch

Reggie Baker
Chief

(317) 243-5092

Jacqueline D. Strecker
Branch Chief

(317) 243-5147

* Arthur Carter
State Project Officer

(317) 243-5070

F. Local Agencies and Officials

* Glenn W. Slaney
Director
Griffith Public Works Department
Griffith Town Hall
111 North Broad Street
Griffith, IN 46319

(219) 924-7500

* Nicholas Doffin
Administrative Assistant
Lake County Health Department
Lake County Government Center
2293 North Main Street
Crown Point, IN 46307

(219) 738-2020

* Ronald L. Mustard
Director Environmental Management
Northwestern Indiana Regional
Planning Commission
8149 Kennedy Avenue
Highland, IN 46322

(219) 923-1060

G. Media

Newspapers

Gary Post Tribune
1065 Broadway
Gary, IN 46402

(219) 881-3000

The Hammond Times
417 Fayette
Hammond, IN 46320

(219) 933-3200

Radio

WJOB
6405 Olcott
Hammond, IN 46320

(219) 844-1230

WWJY
10200 South Broadway
Crown Point, IN 46307

(219) 663-7311

WZVN
Box 311
Lowell, IN 46356

(219) 738-6397

Television

U.S. Cable-TV
6161 Cleveland Street
Merrillville, IN 46410

(219) 887-3031

WMAQ - TV
9105 Indianapolis Blvd.
Highland, IN 46322
Contact: Sharon Kish

(219) 838-4161

H. Other Interested Organizations and Individuals

* George Bunce
Secretary, Izaak Walton League and
Dunes-Calumet Audobon Society
739 North Indiana
Griffith, IN 46319

(219) 924-4046

* Terry Steagall
Member, Toxic Action Task Force
314 Manor Drive
Griffith, IN 46319

(219) 923-4681

* George Milne
Member, Toxic Action Task Force
411 South Griffith Blvd.
Griffith, IN 46319

(219) 924-2446

APPENDIX B

POSSIBLE SITES FOR INFORMATION REPOSITORY AND PUBLIC MEETINGS

A. Public Information Repository

Griffith Town Hall (219) 924-7500
111 North Broad Street
Griffith, IN 46319
Contact: Glenn Slaney
Public Works Director

B. Public Meeting Locations

Griffith Town Hall (219) 924-7500
111 North Broad Street
Griffith, IN 46319
Capacity: 100 people

Griffith High School Auditorium (219) 924-2181
500 North Wig Street
Griffith, IN 46319
Capacity: 500